

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                                   |   |                  |
|-----------------------------------|---|------------------|
| In re: DANIEL J. ADAMSON,         | ) | No. 23-20396-GLT |
|                                   | ) |                  |
| Debtor.                           | ) |                  |
| -----                             | ) |                  |
| DANIEL J. ADAMSON,                | ) |                  |
|                                   | ) |                  |
| Movant,                           | ) |                  |
|                                   | ) |                  |
| v.                                | ) |                  |
|                                   | ) |                  |
| UNITED STATES TRUSTEE, CHARLES    | ) |                  |
| O ZEBLEY CHAPTER 7 TRUSTEE,       | ) |                  |
| KEY BANK, and ONE MAIN FINANCIAL, | ) |                  |
|                                   | ) |                  |
| Respondents.                      | ) |                  |

MOTION TO REOPEN AND TO VACATE DISMISSAL

Debtor Daniel J. Adamson (“Adamson”) moves this Court to reopen the bankruptcy and vacate the dismissal:

1. This is a core proceeding. The Court maintains jurisdiction pursuant to Rule 9024, incorporating F.R.Cv.P. 60(b)(1) for excusable neglect.
2. Adamson was late filing his income statements because he had gathered the wrong time period. He had some difficulty obtaining the more up to date pay stubs and ultimately obtained them last week.
3. While counsel was uploading the missing documents last week and to move for reconsideration, the Clerk closed the case, requiring a motion to reopen in addition to vacate.
4. Adamson believes it is in the best interests of the judicial economy to reopen the present case rather than require him to lodge a second bankruptcy

petition. Indeed, the creditors have already received notice of the bankruptcy and a trustee was assigned. To redo these procedures will neither aid the debtor nor the creditors or trustee.

WHEREFORE, Debtor respectfully requests that this Court reopen the bankruptcy and vacate the dismissal.

Respectfully submitted,

/s/ J. Allen Roth, Esq.

J. Allen Roth, Esq. (PA 30347)  
805 S Alexandria Street  
Latrobe PA 15650  
(724) 537-0939  
lawmatters@yahoo.com

COUNSEL FOR DEBTOR

